

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

In Re:  Generations on 1 <sup>st</sup> LLC,  Debtor.	Case No.: 25-30002  Chapter 11
In Re:  Parkside Place LLC,  Debtor.	Case No.: 25-30003  Chapter 11
Generations on 1st, LLC, Parkside Place, LLC, and The Ruins, LLC,  Plaintiffs,  vs.  Red River State Bank,  Defendant.	Adversary No.: 25-07009

**DEFENDANT’S MOTION TO EXCEED PAGE LIMITATIONS**

**INTRODUCTION**

Defendant Red River State Bank (“RRSB”) submits this motion to exceed the page limitations for its reply brief in support of its Motion to Dismiss. [Doc. 7] As grounds for this motion, RRSB states:

1. In their Complaint, each of the three Plaintiffs have asserted seven (7) separate causes of action against RRSB.

2. The ten (10) page limitation for reply briefs contained in Bankr. D.N.D.L.R. 7007-1(A) does not supply RRSB with adequate space in which to analyze the multiple legal theories raised. Put simply, RRSB requires more space to address the twenty-one (21) separate claims brought, and the factual nuances for each claim with respect to each Plaintiff.

3. In particular, RRSB cannot condense its reply because the parties disagree as to the applicable substantive law for multiple claims brought by Plaintiffs, requiring RRSB to—in addition to analyzing the substantive claims—conduct multiple choice-of-law analyses for the claims.

4. RRSB has conferred with opposing counsel regarding its proposed page limit extension, and opposing counsel does not oppose RRSB's request to exceed the page limitation for reply briefs.

WHEREFORE, RRSB respectfully submits that good cause exists to allow RRSB an extension of the applicable page limitations for its reply brief in support of its motion to dismiss to approximately twenty-two (22) pages.

Dated this 10th day of April, 2025.

**VOGEL LAW FIRM**

BY: /s/ Drew J. Hushka

Caren W. Stanley (#06100)

cstanley@vogellaw.com

Drew J. Hushka (#08230)

dhushka@vogellaw.com

218 NP Avenue

PO Box 1389

Fargo, ND 58107-1389

701.237.6983

ATTORNEYS FOR DEFENDANT